

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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STAR AUTO SALES OF BAYSIDE, INC.	: Case No.: 18-cv-05775 (ERK) (TAM)
(d/b/a STAR TOYOTA OF BAYSIDE),	:
STAR AUTO SALES OF QUEENS, LLC	:
(d/b/a STAR SUBARU), STAR HYUNDAI LLC	:
(d/b/a STAR HYUNDAI), STAR NISSAN, INC.	:
(d/b/a STAR NISSAN), METRO CHRYSLER	:
PLYMOUTH INC. (d/b/a STAR CHRYSLER	:
JEEP DODGE), STAR AUTO SALES OF	:
QUEENS COUNTY LLC (d/b/a STAR FIAT)	:
and STAR AUTO SALES OF QUEENS	:
VILLAGE LLC (d/b/a STAR MITSUBISHI),	:
	: <u>DECLARATION OF JAMIE S. FELSEN</u>
Plaintiffs,	:
	:
v.	:
	:
VOYNOW, BAYARD, WHYTE	:
AND COMPANY, LLP, HUGH WHYTE,	:
RANDALL FRANZEN, and ROBERT SEIBEL,	:
	:
Defendants.	:
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JAMIE S. FELSEN, ESQ., pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.10 of the United States District Court for the Eastern District of New York, declares as follows:

1. I am a member of Milman Labuda Law Group PLLC, counsel of record for Plaintiffs, Star Auto Sales of Bayside, Inc. (d/b/a Star Toyota of Bayside), Star Auto Sales of Queens, LLC (d/b/a Star Subaru), Star Hyundai LLC (d/b/a Star Hyundai), Star Nissan, Inc. (d/b/a Star Nissan), Metro Chrysler Plymouth Inc. (d/b/a Star Chrysler Jeep Dodge), Star Auto Sales of Queens County LLC (d/b/a Star Fiat), and Star Auto Sales of Queens Village LLC (d/b/a Star Mitsubishi) (collectively, “Plaintiffs” or “Star”).

2. I submit this declaration in support of Star’s objections to the December 13, 2023

Order of the Hon. Taryn A. Merkyl, U.S.M.J. denying (i) Star's motion to preclude documents produced by Defendants on June 30, 2023 and (ii) Star's motion to quash subpoena.

3. A copy of the December 13, 2023 Order and the transcript from the December 13, 2023 hearing referred to in the Order are annexed as **Exhibit "A"**.

Dated: Lake Success, New York

December 26, 2023

/s/ Jamie S. Felsen, Esq.